

Exhibit A

Proposed Order

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et
al.*,

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**This filing relates to the
Commonwealth and ERS.**

ORDER GRANTING TWO HUNDRED SIXTY-NINTH OMNIBUS OBJECTION (NON-SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO RICO AND EMPLOYEES RETIREMENT SYSTEM OF THE GOVERNMENT OF THE COMMONWEALTH OF PUERTO RICO TO CLAIMS ASSERTING DUPLICATE LIABILITIES

Upon the *Two Hundred Sixty-Ninth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Claims Asserting Duplicate Liabilities* [ECF No. 14916] (the “Two Hundred Sixty-Ninth Omnibus Objection”),² filed by the Commonwealth of Puerto Rico

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”, and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the “Debtors”) (Bankruptcy Case No. 19-BK-5532-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² Capitalized terms not otherwise defined herein shall have the meanings given to such terms in the Two Hundred Sixty-Ninth Omnibus Objection.

(“Commonwealth”) and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”), dated October 23, 2020, for entry of an order disallowing in their entirety certain claims filed against the Commonwealth or ERS, as more fully set forth in the Two Hundred Sixty-Ninth Omnibus Objection and supporting exhibits thereto; and the Court having jurisdiction to consider the Two Hundred Sixty-Ninth Omnibus Objection and to grant the relief requested therein pursuant to PROMESA section 306(a); and venue being proper pursuant to PROMESA section 307(a); and due and proper notice of the Two Hundred Sixty-Ninth Omnibus Objection having been provided to those parties identified therein, and no other or further notice being required; and each of the claims identified in the column titled “Claims to be Disallowed” in Exhibit A to the Two Hundred Sixty-Ninth Omnibus Objection (collectively, the “Claims to Be Disallowed”) being duplicative of the claims identified in the column titled “Remaining Claims” in Exhibit A (collectively, the “Remaining Claims”); and the Court having determined that the relief sought in the Two Hundred Sixty-Ninth Omnibus Objection is in the best interests of the Commonwealth, ERS, their creditors, and all parties in interest; and the Court having determined that the legal and factual bases set forth in the Two Hundred Sixty-Ninth Omnibus Objection establish just cause for the relief granted herein; and the Court having deemed a hearing is not necessary as no objection, responsive pleading, or request for a hearing with respect to the Two Hundred Sixty-Ninth Omnibus Objection has been submitted, and after due deliberation and sufficient cause appearing therefor, it is hereby

ORDERED that the Two Hundred Sixty-Ninth Omnibus Objection is GRANTED as set forth herein; and it is further

ORDERED that the Claims to Be Disallowed are hereby disallowed in their entirety; and it is further

ORDERED that Prime Clerk, LLC, is authorized and directed to designate the Claims to Be Disallowed as expunged in the official claims registry in the Title III Cases; and it is further

ORDERED that the Debtors' right to object to the Remaining Claims is reserved; and it is further

ORDERED that this Order resolves Docket Entry No. 14916 in Case No. 17-3283; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

SO ORDERED.

Dated: _____

Honorable Judge Laura Taylor Swain
United States District Judge

EXHIBIT A

Schedule of Claims Subject to the Two Hundred Sixty-Ninth Omnibus Objection

Two Hundred and Sixty-Ninth Omnibus Objection
Exhibit A - Substantive Duplicate Claims

CLAIMS TO BE DISALLOWED

REMAINING CLAIMS

	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT
1	BERAS AULET, CAROLINA HC 02 BOX 27226 CABO ROJO, PR 00623	06/29/18	Commonwealth of Puerto Rico 17 BK 03283-LTS	98108	\$ 8,400.00*	BERAS AULET, CAROLINA HC-02 BOX 27226 CABO ROJO, PR 00623	06/29/18	Commonwealth of Puerto Rico 17 BK 03283-LTS	141141	\$ 8,400.00*

Reason: Liabilities asserted on Claim to be Disallowed are duplicative of liabilities asserted on Remaining Claim.

2	BERAS AULET, CAROLINA HC-02 BOX 27226 CABO ROJO, PR 00623	06/29/18	Commonwealth of Puerto Rico 17 BK 03283-LTS	108461	\$ 24,976.41*	BERAS AULET, CAROLINA HC 02 BZN 2722 6 CABO ROJO, PR 00623	06/29/18	Commonwealth of Puerto Rico 17 BK 03283-LTS	119669	\$ 24,976.41
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Reason: Liabilities asserted on Claim to be Disallowed are duplicative of liabilities asserted on Remaining Claim.

3	BURGOS APONTE, CARMEN CALLE DRAGRON X44 EXT. LOMAS VERDES BAYAMON, PR 00956	05/24/18	Commonwealth of Puerto Rico 17 BK 03283-LTS	32499	\$ 100,000.00	BURGOS APONTE, CARMEN EXT LOMAS VERDES X44 CALLE DRAGON BAYAMON, PR 00956	10/03/18	Commonwealth of Puerto Rico 17 BK 03283-LTS	167605	\$ 100,000.00*
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Reason: Liabilities asserted on Claim to be Disallowed are duplicative of liabilities asserted on Remaining Claim.

4	CRUZ BENITEZ, RALPH CARLOS MONDRIGUEZ TORRES P.O. BOX 295 LAS PIEDRAS, PR 00771	08/04/20	Commonwealth of Puerto Rico 17 BK 03283-LTS	174494	\$ 37,500.00	CRUZ BENITEZ, RALPH CARLOS MONDRÍGUEZ TORRES PO BOX 295 LAS PIEDRAS, PR 00771	07/05/18	Commonwealth of Puerto Rico 17 BK 03283-LTS	103140	\$ 37,500.00
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Reason: Liabilities asserted on Claim to be Disallowed are duplicative of liabilities asserted on Remaining Claim.

5	DIEPPA, HILDA MASSA F1-48 CALLE 8 CIUDAD MASSO SAN LORENZO, PR 00754	07/13/20	Commonwealth of Puerto Rico 17 BK 03283-LTS	174256	\$ 30,000.00	MASSA DIEPPA, HILDA F 1-48 CALLE 8 CIUDAD MASSO SAN LORENZO, PR 00754	07/20/20	Commonwealth of Puerto Rico 17 BK 03283-LTS	174206	\$ 30,000.00
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Reason: Liabilities asserted on Claim to be Disallowed are duplicative of liabilities asserted on Remaining Claim.

Two Hundred and Sixty-Ninth Omnibus Objection
Exhibit A - Substantive Duplicate Claims

CLAIMS TO BE DISALLOWED

REMAINING CLAIMS

	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT
6	HL CENTROVISION GROUP HR INC #652 AVE MUÑOZ RIVERA MONTE MALL SUITE 2000 HATO REY, PR 00918	05/29/18	Commonwealth of Puerto Rico 17 BK 03283-LTS	43770	\$ 517,168.60	HL CENTROVISION GROUP HR INC. AVE MUÑOZ RIVERA #652 EL MONTE MALL SUITE 2000 HATO REY, PR 00918	05/29/18	Commonwealth of Puerto Rico 17 BK 03283-LTS	43066	\$ 517,168.60

Reason: Liabilities asserted on Claim to be Disallowed are duplicative of liabilities asserted on Remaining Claim.

7	KCI 12930 INTERSTATE 10 WEST SAN ANTONIO, TX 78249	05/25/18	Commonwealth of Puerto Rico 17 BK 03283-LTS	21190	\$ 107,065.13	KCI - KINETIC CONCEPTS INC. 12930 INTERSTATE 10 WEST SAN ANTONIO, TX 78249	06/05/18	Commonwealth of Puerto Rico 17 BK 03283-LTS	46203	\$ 107,065.13
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Reason: Liabilities asserted on Claim to be Disallowed are duplicative of liabilities asserted on Remaining Claim.

8	MARTINEZ VELEZ, RUTH DALIA LUISA PMB 506 609 AVE. TITO CASTRO SUITE 102 PONCE, PR 00716-0200	04/20/20	Commonwealth of Puerto Rico 17 BK 03283-LTS	173749	\$ 4,000.00	MARTINEZ VELEZ, RUTH DALIA LUISA PMB 506 609 AVE. TITO CASTRO SUITE 102 PONCE, PR 00716-0200	07/14/20	Commonwealth of Puerto Rico 17 BK 03283-LTS	174279	\$ 4,000.00
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Reason: Liabilities asserted on Claim to be Disallowed are duplicative of liabilities asserted on Remaining Claim.

9	MARTINEZ VELEZ, RUTH DALIA LUISA PMB 506 609 AVE. TITO CASTRO SUITE 102 PONCE, PR 00716-0200	04/21/20	Employees Retirement System of the Government of the Commonwealth of Puerto Rico 17 BK 03566-LTS	173751	\$ 2,375.52	MARTINEZ VELEZ, RUTH DALIA LUISA PMB 506 609 AVE. TITO CASTRO SUITE 102 PONCE, PR 00716-0200	07/14/20	Employees Retirement System of the Government of the Commonwealth of Puerto Rico 17 BK 03566-LTS	174266	\$ 2,375.52
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Reason: Liabilities asserted on Claim to be Disallowed are duplicative of liabilities asserted on Remaining Claim.

10	NUNEZ RIOS, MAYRA PO BOX 40016 SAN JUAN, PR 00940	05/16/18	Employees Retirement System of the Government of the Commonwealth of Puerto Rico 17 BK 03566-LTS	16231	\$ 148,825.12	NUNEZ RIOS, MAYRA COND MIRAMAR ROYAL TORRE SUR 706 CALLE ROOSVELT APT 301 SAN JUAN, PR 00907	05/15/18	Employees Retirement System of the Government of the Commonwealth of Puerto Rico 17 BK 03566-LTS	39505	\$ 148,825.12
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Reason: Liabilities asserted on Claim to be Disallowed are duplicative of liabilities asserted on Remaining Claim.

Two Hundred and Sixty-Ninth Omnibus Objection
Exhibit A - Substantive Duplicate Claims

CLAIMS TO BE DISALLOWED

REMAINING CLAIMS

NAME	DATE FILED	CASE NUMBER / DEBTOR	<u>CLAIM #</u>		NAME	DATE FILED	CASE NUMBER / DEBTOR	<u>CLAIM #</u>	
			CLAIM #	CLAIM AMOUNT				CLAIM #	CLAIM AMOUNT
11 PACHECO MARTINEZ, NORMA J PO BOX 767 HORMIGUEROS, PR 00660	06/28/18	Commonwealth of Puerto Rico 17 BK 03283-LTS	145907	\$ 25,000.00	PACHECO MARTINEZ, NORMA J PO BOX 767 HORMIGUEROS, PR 00660	07/03/18	Commonwealth of Puerto Rico 17 BK 03283-LTS	153793	\$ 25,000.00

Reason: Liabilities asserted on Claim to be Disallowed are duplicative of liabilities asserted on Remaining Claim.

12 SOTELO SANTIAGO, NELSON P 21 CALLE 8 URB MEDINA ISABELA, PR 00662-3814	10/17/17	Commonwealth of Puerto Rico 17 BK 03283-LTS	237	\$ 1,159.00	NELSON SOTELO SANTIAGO & MARIA L. ACEVEDO RUIZ URB MEDINA P 21 CALLE 8 ISABELA, PR 00662-3814	10/17/17	Commonwealth of Puerto Rico 17 BK 03283-LTS	252	\$ 1,159.00
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Reason: Liabilities asserted on Claim to be Disallowed are duplicative of liabilities asserted on Remaining Claim.

13 ZAYAS BURGOS, ANA VIOLETA RR 9 BOX 1079 SAN JUAN, PR 00926	07/23/20	Commonwealth of Puerto Rico 17 BK 03283-LTS	174295	\$ 1,548.30	ZAYAS BURGOS, ANA VIOLETA RR 9 BOX 1079 SAN JUAN, PR 00926	07/24/20	Commonwealth of Puerto Rico 17 BK 03283-LTS	174298	\$ 1,548.30*
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Reason: Liabilities asserted on Claim to be Disallowed are duplicative of liabilities asserted on Remaining Claim.